Case 19-16714-CMG Doc 101 Filed 09/01/22 Entered 09/01/22 12:23:45 Desc Mair Document Page 1 of 1

DONALD V. VALENZANO, JR - 011282010

PRESSLER, FELT & WARSHAW, LLP

SHELDON H. PRESSLER (1955-2017)

GERARD J. FELT (NJ)
DAVID B. WARSHAW (NJ, NY, MA)

MICHAEL J. PETERS (NJ, NY)
CHRISTOPHER P. ODOGBILI (NJ)
DARREN H. TANAKA (NJ, NY)
FRANCIS X. GRIMES (NJ, PA)
CRAIG S. STILLER (NJ, NY, PA)
IN Z. WINOGRAD (NJ, NY, PA, DC)

DONALD V. VALENZANO JR. (NJ, NY)

ATTORNEYS AT LAW
7 Entin Rd.
Parsippany, NJ 07054-5020
Office: (973) 753-5100
Toll Free: (888)312-8600
Fax: (973) 753-5353
Website: pfwattorneys.com

NY Office:

305 Broadway, Suite 802

New York, NY 10007

PATRICK WONG (NJ, NY)
JESSE R. BARREIRO (NJ, IL)
HOWARD SCHACHTER (NJ, NY)
MATTHEW J. MARTELLO (NJ, PA)
THEOLOGIA PAPADELIAS (NJ)
GERARDINO DI POPOLO (NJ)
SEAN P. STEVENS (PA)
CHRISTOPHER P. DELCIOPPIO (NJ,NY)

RYAN R. TAPPAN (NY)
STEPHEN E. LUNDY (NJ))
CHRISTOPHER B. CARFAGNO (PA)
LLOYD GARNER (NJ)
DANTE P. CIANNI (NJ)
NICHOLAS DEENIS (NJ, PA)
DANIEL J. SANTUCCI (NJ,PA)
NURSEDA KUCUKKARCA (NJ,NY)

Office Hours:

PA Office: Monday-Friday: 8am-6pm
400 Horsham Rd. Suite 110 DCWP License Number: 2069242-DCA
Horsham, PA 19044 [X] New Jersey Office [] New York Office [] Pennsylvania Office

SEPTEMBER 1, 2022

Via ECF

HON. CHRISTINE M GRAVELLE UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Re: IN RE LUIS GARRO

UNITED STATES BANKRUPTCY COURT, DISTRICT OF NEW JERSEY

CASE NO.: 19-16714-CMG

RE: DEBTOR MOTION TO AVOID/CANCEL CREDITOR'S JUDGMENT LIEN

PFW FILE NUMBER: L139307A

To Hon. Christine M Gravelle:

This firm represents the Creditor, State of New Jersey, Office of Special Compensation Funds (the "Creditor"), in the above-referenced bankruptcy case. This office is in receipt of Debtor Luis Garro's Motion to Avoid and Cancel Judgment Lien that is presently returnable on September 7, 2022 (the "Motion"). Please accept this letter in response to the Motion.

Creditor has reviewed its case and is in the process of voluntarily vacating its judgment. That process is underway, though does take time as Creditor must file the pertinent paperwork through the appropriate channels with the New Jersey Superior Court. Accordingly, Creditor respectfully requests that the Court deny the instant Motion as moot. Alternatively, Creditor respectfully requests that the Court adjourn the Motion to afford sufficient time for the process (vacatur of Creditor's judgment) may be completed.

If the Court has any questions regarding this submission, or any other issues or concerns, please feel free to contact me using the above-information. Thank you for the Court's courtesies.

Respectfully Submitted,

PRESSLER, FELT & WARSHAW, LLP

/s/ Donald V. Valenzano Jr. DONALD V. VALENZANO, JR

This communication is from a debt collector.

Via ECFVia ECFCC: CANDYCE I SMITH-SKLARALBERT RUSSOSKLAR SMITH-SKLARSTANDING CHAPTER 13 TRUSTEE1901 N OLDEN AVE SUITE 22CN 4853EWING, NJ 08618TRENTON, NJ 08650